

IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF WISCONSIN

TRAVIS D. WILLIAMS  
PLAINTIFF

V.

ELIFSON  
BRADLEY FEDIE  
WEBSTER  
ROTH

42 U.S.C. 1983

JOHN DOES #1 #2 #3

LAXTON

RUDIE

SAYLOR  
NURSE JANE DOE  
WATKINSON  
JULIA PAYNE  
DEFENDANTS

1. PLAINTIFF

TRAVIS D. WILLIAMS IS INCARCERATED AT THE WISCONSIN  
SECURE PROGRAM FACILITY (WSPF), 1101 MORRISON DR, P.O.  
BOX 1000 BOSCOBEL WISCONSIN 53805

2. DEFENDANTS

EACH DEFENDANT WAS EMPLOYED AT THE WSPF AT THE  
TIMES RELEVANT TO ALL CLAIMS IN THIS SUIT IN THE  
FOLLOWING CAPACITIES:

- A.) ELKEFSON STILL WORKS AT THE WSPF.
- B.) BRADLEY FERGIE WORKS AT ANOTHER INSTITUTION FOR W.D.D.C. (ARVINDU CHEN)  
(PRANAV DU CHEN)
- C.) WEBSTER STILL WORKS AT THE WSPF.
- D.) ROTH STILL WORKS AT THE WSPF.
- E.) JOHN DOES #1 #2 #3 & # NEEDS TO BE IDENTIFIED.
- F.) LAYTON STILL WORKS AT THE WSPF AS A OFFICER ON DELTA UNIT.
- G.) RUDIE STILL WORKS AT THE WSPF AS A OFFICER.
- H.) SAYLOR STILL WORKS AT THE WSPF.
- I.) NURSE JANE DOE STILL NEEDS TO BE IDENTIFIED.
- J.) JOLINDA WATERMAN RETIRED IN MAY 2019.
- K.) JULIA PAYNE STILL WORKS AT THE WSPF.

4. GRIEVANCE ADMINISTRATIVE PROCESS HAS BEEN FULLY EXHAUSTED

## STATEMENT PURSUANT TO Fed. R. CIV. PRO 8(A)

PLAINTIFF TRAVIS D. WILLIAMS BRINGS THESE CLAIMS PURSUANT TO 42 U.S.C. 1983 FOR VIOLATIONS UNDER THE 1ST, 4th, 8th, & 14th AMENDMENTS OF THE UNITED STATES CONSTITUTION VIOLATING THE PLAINTIFF RIGHTS TO BE FREE FROM EXCESSIVE FORCE, CRAUEL AND UNUSUAL PUNISHMENT, DELIBERATE INDIFFERENCE TO PLAINTIFFS SERIOUS MEDICAL NEEDS, DELIBERATELY BEING INDIFFERENT TO PLAINTIFFS SERIOUS MEDICAL CONDITIONS, BEING DELIBERATE INDIFFERENT TO PLAINTIFFS SERIOUS MENTAL HEALTH CONDITIONS, BY DEFENDANTS ACTING UNDER THE COLOR OF STATE LAW.

THE PLAINTIFF IS ALSO ASKING THE COURT TO EXERCISE ITS

SUPPLEMENTAL JURISDICTION PURSUANT TO 28 U.S.C. 1331,  
AND 28 U.S.C. 1367 (1) CLAIMS ARE NOVEL AND COMPLEX  
ISSUES OF STATE LAWS OF WISCONSIN PURSUANT TO

WISCONSIN STATUTES (WIS. STAT.) WIS. STAT. 940.285 ABUSE OF  
INDIVIDUALS AT RISK, WIS. STAT. 940.29 ABUSE OF RESIDENTS OF A  
PENAL (INSTITUTION) FACILITIES, WIS. STAT. 946.12 MISCONDUCT IN PUBLIC  
OFFICE, WIS. STAT. 939.63 PENALTIES FOR USE OF DANGEROUS  
WEAPONS, WIS. STAT. 940.19 BATTERY 6(A) & WIS. STAT. 940.19 (B),  
WIS. STAT. 101.11, 893.80. (4) SAFE PLACE ACT BECAUSE THE  
PLAINTIFF IS DISABLED AND EACH DEFENDANT ACTUALLY KNOWS THIS.

PLAINTIFF IS ALSO ASKING THE COURT WHILE EXERCISING ITS  
SUPPLEMENTAL JURISDICTION PURSUANT TO 28 U.S.C. 1331, AND  
28 U.S.C. 1367 (1) FOR STATE LAW VIOLATIONS OF WISCONSIN  
STATUTES TO GRANT RELIEF PURSUANT TO FEDERAL STATUTES  
AND STATUTES OF WISCONSIN STATE STATUTES AS FOLLOWS:

FED. R. C.P. 69 (A)(1) 28 U.S.C. 3104 (A) Garnishments  
28 3101 (A), 26 U.S.C. 1962.

WISCONSIN STATUTES: WIS. STAT 812.42 GARNISHMENTS OF EARNINGS OF  
PUBLIC OFFICERS, WIS. STAT. 757.36 LIEN OF PROCEEDS TO ENFORCE CAUSE OF  
ACTION.

WIS. STAT. § 812.35 COMMENCEMENT OF ACTION (A) & 3 (A).

Again pursuant to FEDERAL RULES OF CIVIL PROCEDURE 8 (A) A PLAINTIFF'S STATEMENTS PLAINTIFF TRAVIS D. WILLIAMS (WILLIAMS HEREAFTER) STATES THAT ON FEBRUARY 24, 2019 ABOUT 7 P.M. HE WAS GIVEN 3 WRONG MEDICATIONS THAT HE HAD A SERIOUS ADVERSE REACTION TO THAT CAUSED INTERNAL STOMACH BLEEDINGS, ANAL BLEEDINGS & A COUGHING UP OF BLOOD FOR 5 HOURS OR LONGER THAT ALSO HAD A CHEMICAL ADVERSE MENTAL REACTION TO WILLIAMS WHICH ALL WAS A SERIOUS RISK TO WILLIAMS HEALTH AND EACH DEFENDANT WAS DELIBERATE INDIFFERENT TO WILLIAMS SERIOUS MEDICAL CONDITIONS, DELIBERATE INDIFFERENT TO WILLIAMS SERIOUS MEDICAL NEEDS, DELIBERATE INDIFFERENT TO WILLIAMS SERIOUS MENTAL HEALTH NEEDS, DELIBERATE INDIFFERENT TO WILLIAMS SERIOUS MENTAL HEALTH CONDITIONS, THE THIRD MEDICATION IS KNOWN TO CAUSE A PERSON VIOLENT AGGRESSIVE CONDUCT, SUCH AS ATTACKS ON OTHER PERSONS, EXTREME VIOLENT ASSAULTS. THE MEDICATION OF TRAZADONE SEE ATTACHED EXHIBIT.

ON FEBRUARY 24 2019 AT 7 P.M. MEDICATION PASS OFFICERS PASS OUT CONTROLLED MEDICATIONS TO INMATES AT THE USP, AN SERGEANT (SGT.) ANNOUNCES OVER THE IN CELL INTERCOMS MED-PASS, ① IF YOU WANT YOUR MEDS CALL UP.

1. IF YOU WANT YOUR MEDS CALL UP MEANS FOR IF THE INMATE WANTS HIS STOP CONTROLLED MEDICATIONS HE HAS TO PRESS HIS IN CELL INTERCOM BUTTON WHICH NOTIFIES THE SGT. THAT INMATE WANTS HIS MEDICATIONS.

So on 2-24-09 I WAS AT THE WSPF ON UNIT Foxrot AND WAS HOUSED IN CELL # 105, AND C.O. ELIEFSON WAS DESIGNATED TO PASS OUT MEDICATIONS, THIS C.O. CAME TO MY CELL AND I TOLD HIM TO GIVE ME MY MEDICATIONS, I CLEARLY TOLD THIS C.O. DO NOT PUT THE MEDICATION OF TRAZADONE IN THE CUP, HE SAID I CAN ONLY FIND 3 OF YOUR MEDICATIONS & TOLD HIM IVE GOT WAY MORE THAN THAT, I SAID YOU GOT TO CALL ALPHA UNIT AND GET THE REST HE SAID HE WOULD SO HE HANDCUFFED ME TO MY CELL DOOR BECAUSE OF THE RETALIATORY MEDICAL DISCIPLINARY STATUS LT. FEDIA & MARK KARTMAN PLACED ME ON TITLED TEATHER TO DOOR. C.O. ELIEFSON HAD 3 MEDICATION CARDS ON TOP OF THE CUP HE "SCANNED MY IDENTIFICATION CARD THEN PICKED UP THE 3 MEDICATION CARDS AND SCANNED EACH ONE SO THEY COULD BE DOCUMENTED BY THE COMPUTER SYSTEM, BUT WHEN C.O. ELIEFSON WOULD SCAN ONE MEDICATION CARD AND THEN START TYPING SOMETHING ON THE COMPUTER, WILLIAMS WOULD SEE C.O. ELIEFSON DO THIS 3 TIMES C.O. ELIEFSON WOULD GIVE WILLIAMS ~~██████████~~ HIS MEDICATION & HANDED THEM ~~██████████~~ IN A SMALL MEDICATION DOSAGE CUP, LOOKS AT THE PILLS THERE WERE 2 WHITE PILLS IN THE CUP AND ONE GREEN PILL WILLIAMS SWALLOWED THE PILLS AND WHILE C.O. ELIEFSON WAS UNHANDCUFFING FROM THE CELL DOOR WILLIAMS ARM, WILLIAMS STATES LET ME SEE THOSE MED-CARDS

1. SCANNED MY IDENTIFICATION CARD, IS THE PROCEDURE TO ALLOW THE COMPUTER TO ACCESS ALL THE PROPER PRESCRIBED MEDICATION THAT A INMATE HAS AND WHEN MED CARD IS SCANNED THE COMPUTER VERIFIES THAT THE INMATE IS ALLOWED TO HAVE THAT MEDICATION AT THAT TIME OF MED-PASS.

C.O. ELLEFSON SHOWED WILLIAMS THE MEDICATION CARDS

WILLIAMS STATES MAN THIS "DERICK WILLIAMS" MEDICATIONS  
THATS WHY YOU KEPT PUNCHING IN STUFF WHEN YOU SCANNED  
THE CARD THIS MEDICATION DID NOT MATCH MY IDENTIFICATION  
"THE COMPUTER WAS TELLING YOU DUMB[SIC] DONT GIVE ME  
DERICK WILLIAMS' MEDICATIONS, WILLIAMS FURTHER STATES MAN  
YOU CANT TELL THE DIFFERENCE BETWEEN THE LETTER "T" &  
"D" ? OR THE NAMES TRAVIS WILLIAMS & DERICK WILLIAMS?  
ELLEFSON STATED "Ahh MAN" I SAID LOOK YOU GOT TO CALL ME  
A NURSE YOU GAVE ME TRAZADONE, AND I SAID THAT MAN IVE  
BEEN WRERING MYSELF OFF OF THAT CAUSE IT CAUSES ME TO  
HAVE REAL BAD STOMACH ACHES & SOMETIMES STOMACH BLEEDINGS, I  
HAVE TO EAT VERY GOOD BEFORE I TAKE THAT, I FURTHER SAID  
MAN I AM GOING TO START BLEEDING GET ME A NURSE I NEED  
SOMETHING TO INDUCE VOMITING, HE, C.O. ELLEFSON WAS NOT EVEN  
PAYING ME ANY ATTENTION HE'S LOOKING THROUGH THE 'MED-CART  
AT OTHER MEDICATION CARDS, (HE) C.O. ELLEFSON CALLS C.O. LAXTON  
HE WHISPERS SOMETHING TO C.O. LAXTON I TELL LAXTON THIS  
CLOWN JUST GAVE ME 3 PILLS 2 WHITE ONES & A GREEN ONE, AND

1. medcart is a medication lock cart with 1 small DRAWER & 3 OTHER  
BIGGER DRAWERS THAT HOLDS ONE HOURS UNITS INMATES MEDICATIONS  
TO BE DISTRIBUTED BY OFFICERS UP TO 4 TIMES PER DAY AT 6 AM  
10 AM 3 PM & 7 PM.



I NEED A NURSE, LAXTON STARTED THUMBING THROUGH THE Y  
ROWS OF MEDICATION CARDS I REPEAT I NEED A NURSE THEY  
BOTH MOVE THE MED-CART FROM IN FRONT OF MY DOOR BUT  
MY DOORS TRAP IS STILL OPEN AND I HEAR THEM BOTH TALKING C.O.  
LAXTON TELLS C.O. ELLERSON WHEN THEY ASKED TELL THEM YOU  
GAVE HIM THIS. I IMMEDIATELY PRESSED MY IN CELL CALL  
BUTTON AND TOLD SGT SAYLOR THAT AT LEAST 3 TO 4 MINUTES  
AGO I WAS GIVEN 3 PILLS THAT I AM NOT PRESCRIBED AND ONE  
OF THEM IS GOING TO MAKE ME SICK AND START ME TO BLEEDING  
INSIDE MY STOMACH INTERNALLY WILLIAMS FURTHER STATED THAT  
OFFICERS ELLERSON & LAXTON IS TRYING TO COVER UP THAT  
THEY GAVE ME 3 MEDICATIONS FROM DERRICK WILLIAMS. SGT. SAYLOR  
SAYS HE WOULD SEE WHATS GOING ON, WILLIAMS STATES MAN  
LOOK AT THE CAMERA THEY'RE STILL THUMBING THROUGH THE  
MEDICATIONS, WILLIAMS WOULD ALSO STATE THAT OFFICERS  
ELLERSON AND LAXTON WILL NOT CALL ME A NURSE SGT.  
SAYLOR REPEATS LET ME SEE WHATS GOING ON.

WHILE I AM WAITING ON SGT. SAYLOR TO SEE WHATS  
GOING ON I STARTED GETTING A REAL BAD CASE OF  
ACID REFLUX, WILLIAMS HAS GERD VERY BAD HE TAKES THE  
MEDICATIONS OF OMEPRAZOLE DR 40 MG SUCRAFATE 160  
RANITIDINE 300 MG TUMS, MALOX, OR OME PRAZOLE ONCE A DAY

SUCRALFATE 4 TIMES PER DAY, RANITIDINE 2-150mg  
PILLS AT BEDTIME, 6 TUMS PER DAY & 30ml OF MALOX A DAY  
WILLIAMS GASTRIC ~~SEVERE~~ MEDICAL CONDITIONS HAS CAUSED WILLIAMS  
CRITICAL COMPLICATIONS OF CHEST ACUTE PAINS & BLEEDINGS FROM  
STRONG ACID IN HIS STOMACH THAT BUILDS UP FROM  
TAKING THE WRONG MEDICATIONS WITHOUT PRECAUTIONS, OR  
EATING THE WRONG FOODS WITHOUT PRECAUTION, AND HAS  
CAUSED WILLIAMS TO REGURGITATE HIS FOOD OR VOMIT WHEN  
THIS HAPPENS THE ACID BURNS WILLIAMS THROAT & AT TIMES  
WILLIAMS HAS BLOODY STOOL. SO WILLIAMS STARTS HAVING A  
BAD CASE OF ACID REFLUX WITH SMALL CHUNKS OF FOOD COMING BACK UP  
WILLIAMS THROAT ALONG WITH ACID AND SPOTS OF BLOOD CAN BE SEEN  
IN THE TOILET, WILLIAMS TAKES SOME TUMS HOPING THIS CURES THE  
BURNING IN THE CENTER OF HIS STOMACH AND THE REGURGITATING OF FOOD.

THIS DID NOT WORK THINGS GOT WORSE BIGGER CHUNKS OF ~~FOOD~~ FOOD STARTED  
COMING UP WITH MORE BLOOD, I PRESS THE IN-CELL CALL BUTTON AGAIN  
I SAID LOOK YOUR 2 OFFICERS OF ELBERSON & LAXTON DID NOT  
DOCUMENT THE MEDICATION I TOOK, I ASKED BOTH OF THEM TO WRITE  
A INCIDENT REPORT THEY WROTE NOTHING, I ASKED THEM TO GET ME  
AN ~~ANAL~~ ANAL THEY DID NOTHING, I TOLD BOTH OF THEM I'VE GOT ACID REFLUX  
REAL BAD, THIS IS NOT A CASE OF HEARTBURN, I NOW HAVE BIGGER  
CHUNKS OF FOOD COMING BACK UP AND THE ACID IS COMING UP WITH IT.  
I FURTHER STATE THE KEEP ON <sup>PERSON</sup> ~~PERSON~~ OTC MEDS I HAVE DONT WORK  
I TOOK SOME TUMS ABOUT 45 MIN. AGO AND MY STOMACH



IS STILL BURNING Sgt. Saylor TELLS ME HE INFORMED THE NURSE AND A INCIDENT REPORT IS GOING TO BE WRITTEN I SAY WHEN YOU WRITE IT I WANT YOU TO GIVE ME THE NUMBER OF THE INCIDENT REPORT AND PLEASE CALL THE NURSE AND TELL HER IF SHE LOOK AT MY MEDICAL RECORD OF ENDOSCOPY SHE WOULD SEE WHY SHE NEEDS TO GET DOWN HERE A.S.A.P. Sgt Saylor Did nothing, WHAT HE DID WAS SEND C.O. RUDIE TO MY CELL WITH A BOTTLE OF TUMS, I SHOWED C.O. RUDIE I HAVE A BOTTLE OF TUMS, AND I TOLD HIM TO CALL ME A NURSE, C.O. RUDIE STATES HE WOULD CALL THE HEALTH SERVICE UNIT, HE DID NOTHING FOR ALMOST 2 HOURS, THEN COMES BACK TO WILLIAMS CELL WITH A BOTTLE OF LIQUID ANTACID ROLOX HE C.O. RUDIE STATES THE NURSE SAYS TRY THIS I GO TO ONE OF MY IN CELL HANDICAP RAILINGS GOT THE IDENTICAL TYPE OF LIQUID ANTACID ROLOX OFF MY RAILING AND SHOW C.O. RUDIE LOOK MAN I GOT THE SAME STUFF I SAID LOOK DUDE I AM BLEEDING WHEN I REGURGITATE I SAID I JUST HAD A BOWEL MOVEMENT ABOUT ONE HOUR AGO AND I SEE BLOODY SPOTTING IN MY STOOL, I SAY IF YOU GIVE ME SOMETHING TO PUT THE FECES IN YOU CAN SEE FOR YOURSELF AND THEN SHOW THE NURSE, I SAID NEXT IF I REGURGITATE AND IF YOU GIVE ME A STYROFOAM CUP I CAN SPIT IT IN THERE AND YOU CAN SEE THAT TOO AND DOCUMENT IT C.O. RUDIE TELLS WILLIAMS HE'S NOT DOCUMENTING ANYTHING, WILLIAMS ASK C.O. RUDIE WHY NOT HE STATES (1) I DON'T HAVE TO & (2)

its not my job, so I TELL C.O. RUDIE IF I SPIT  
THIS BLOOD IN YOUR FACE YOU WOULD DOCUMENT THAT.  
WOULDN'T YOU? C.O. RUDIE STATES IS THAT A THREAT  
WILLIAMS? I SAID NO BUT I AM JUST POINTING OUT THE  
CIRCUMSTANCES THAT YOU WOULD DOCUMENT THINGS, BUT  
ABSOLUTELY REFUSED TO DOCUMENT THE THINGS YOU SUPPOSE TO.

So while C.O. RUDIE WAS STANDING THERE I PUT A YELLOW  
LEGAL ENVELOPE IN THE WINDOW AND TOLD C.O. RUDIE GET  
ME A NURSE CLOWN, AND I CUT MY LIGHT OFF SAT DOWN  
AND STARTED WRITING A REQUEST STATING STAFF MISCONDUCT  
BY EACH DEPENDANT ON THE UNIT, C.O. RUDIE STATES UN-  
COVER YOUR WINDOW I SAID RUDIE MY WINDOW IS NOT ~~UN~~  
COVERED I AM SITTING DOWN I CAN SEE YOU AND YOU  
CAN SEE ME SO GET ME A NURSE YOU'RE WORRIED ABOUT  
A [sic] WINDOW BUT NOT ME GET THE [sic] AWAY  
FROM MY DOOR AND TAKE YOUR [sic] DOWN TO THE HEALTH  
SERVICE UNIT AND TELL THE NURSE WHAT'S GOING ON WITH ME  
IN THIS CELL, C.O. RUDIE STATES AGAIN WILLIAMS IN CUBBY I  
STATE GET ME A NURSE. C.O. RUDIE LEFT & DID NOT COME BACK  
FOR AT LEAST ONE HOUR, I PRESSED MY CALL BUTTON AFTER  
C.O. RUDIE LEFT AND TOLD SGT STAYLOR WHY IS YALL  
BULLSH - I - - - I? I AM SERIOUSLY SICK IN HERE GET ME A

Sgt Snylon states I told HER AND SHE SAID SHE  
WOULD COME APTN SHE PASSED OUT HER MEDICATIONS, BUT  
NOW HSU IS CLOSED AND SHE WENT HOME, I ASKED <sup>WHAT</sup> NURSE DID  
YOU TALK TO? Sgt Snylon states HE DID NOT KNOW HER  
NAME. I THEN STATED I KNOW EXACTLY HOW TO GET SOME  
ONE DOWN HERE AND GET MEDICAL AND GOT THE INCIDENTS  
DOCUMENTED SO NOW ITS ABOUT 9:15 AM. I FULLY COVERED THE  
CELL WINDOW. SO C.O. RUDIE COMES TO THE CELL AND STARTS  
CALLING MY NAME I REFUSED TO ANSWER, THEN C.O. LOXTON  
COMES TO THE CELL AND I TOLD HIM GET ME A NURSE, THEN  
C.O. RUDIE COMES BACK TO MY CELL AND STATES WILLIAMS  
UNCOVER, I DONT ANSWER HIM. EACH CELL DOOR IN GENERAL  
POPULATION HAS 3 TRAP DOORS ONE AT THE TOP WHERE THEY  
CAN OPEN THE ENTIRE TOP THAT OPENS TO THE SIDE OF THE  
DOOR WHICH WOULD GIVE GUARDS AT LEAST 2 1/2 FEET WIDE & 3 FEET  
~~LONG~~ LONG ACCESS TO LOOK IN THE CELL THE 2ND TRAP IS ABOUT  
2 FEET WIDE AND IS USE TO HANDCUFF, PASS MEALS IN, AND  
3RD TRAP IS 2 FEET WIDE WHICH IS USED TO SHACKLE INMATES  
OR PASS UNSANITARY THINGS IN THE CELL SUCH AS TOILET BRUSH,  
MOPS. SO C.O. RUDIE STICKS THE KEY IN THE TOP TRAP,  
WILLIAMS STATES SOON AS YOU OPEN THAT TRAP I AM GOING TO  
SPIT THIS BLOOD IN YOUR FACE, HE C.O. RUDIE STATES THATS A

~~THREAT~~ WILLIAMS, WILLIAMS STATES NO THAT'S A PROMISE  
AND I bet you DOCUMENT THIS, SO WHEN I FOLE THE CAR  
BUT THE JURY CAN SEE YOUR STATE OF MIND OF NOT  
HAVING ANY CONCERNS FOR MY HEALTH OR RISK OF PERMANENT  
INJURY OR DEATH, YOU NEVER CALLED A NURSE [SIC] WHAT YOU  
DID WAS CONSPIRING WITH YOUR CO WORKERS OF ELLERSON, LAYTON  
& SAYLON AND TRIED TO GIVE ME SOMEONE ELSE TURNS & 200X  
THAT'S WHY YOU WOULD NOT TURN THE BOTTLES AROUND WHEN I  
TOLD YOU TO, YOU WENT ON THE MED CART AND GOT SOMEBODY  
ELSE [SIC] YOU JUST HID THE LABEL WITH THE PERSON NURSE ON  
IT. WILLIAMS FURTHERED STATED OPEN THE TRAP RUDIE SO I CAN  
SPIT THIS BLOOD IN YOUR FACE, YOU CLOWNS GAVE ME 3 WIMMY  
MEDICATIONS AND HAVE BEEN LYING FOR 2 HOURS NOW ABOUT NOTIFYING  
THE MEDICINE UNIT ABOUT MY SITUATION, THEY KNOW I'VE GOT REAL  
BAD GERD AND WOULDNT SEND ME THE MEDICATIONS DOWN HERE I ALL  
READY GOT NOW GOT THE HELL AWAY FROM MY DOOR AND GOT ME A NURSE  
CLAWN.

9:30 P.M. COUNT WAS ~~IN~~ EFFECT BY THIS TIME AND BY WSP  
PRISON RULES COUNT CANT BE COMPLETE UNLESS A PRISON  
GUARD CAN ACTUALLY SEE THE INMATE, SO THE GUARD COULD NOT  
SEE ME SO THIS HOLD UP COUNT ALL AROUND THE STATE OF  
WISCONSIN, SO NOW IT HAD TO BE DOCUMENTED WHY WILLIAMS  
NEEDED A NURSE, AND A NURSE WAS CALLED AND IT WAS  
ALLEGED BY CAPTAIN BRINKMAN THAT SHE WAS SUPPOSE TO  
COME TO

Williams cell after she got done passing out her medications but Nurse Jane Doe went home without seeing Williams. Then Nurse Jane Doe was not contacted until 9:30 p.m., and the incident didn't start until 7 a.m.

Evidencing Eliason Laxton Rudie & Saylor disregarded the risk to Williams and contacted no one but Lt. Fedie.

Lieutenant Bradley Fedie would come to Williams cell hollering and screaming Williams uncovered, at this time only half of the cell's door window was ~~covered~~ covered, Williams was sitting in a chair right at his door, Williams stood up and while he was removing the only envelope in his window Lt. Fedie told someone a John Doe officer to open the trap, Lt. Fedie proceeded to spray an olefin spray on Williams, and it was more than 3 second short burst that's stipulated by D.O.C. policy which Williams has been denied to obtain citing its confidential. Williams started coughing and spitting up blood, blood was coming out of Williams mouth & nose, Williams was held in the cell for at least 5 min while choking, & coughing.

Lt. Fedie finally opened the trap door while hollering & screaming put your hands through the trap Williams is on soft cuff restraints due to his physical disability of a deformed left arm, and his left arm from a surgery is 2 inches shorter than his right arm Lt. Fedie made Williams put both



ARMS BEHIND HIS BACK CAUSING WILLIAMS ~~INSTANT~~ PAIN  
IN HIS LEFT BUTT & SHOULDER IF LT. FOLIO WOULD OF PLACED  
WILLIAMS IN SOFT RESTRAINTS THERE WOULD OF BEEN NO INJURY  
BUT LT. FOLIO SADISTICALLY & MALICIOUSLY DID THIS TO CAUSE  
HARM TO WILLIAMS. ONCE THE CELL DOOR OPENED LT. FOLIO  
FURTHER STATED THAT WILLIAMS WOULD NOT BE PLACED IN HIS  
WHEELCHAIR HE WILL WALK, THIS TO CAUSED WILLIAMS MORE  
ACUTE INJURY TO HIS RIGHT Calf & WILLIAMS SUFFERED A  
Groin pulled which both WAS EXTREMELY PAINFUL, WILLIAMS  
WAS BASICALLY FAST WALKED DRAGGED TO THE SEGREGATION UNIT, PUT IN  
A SEGREGATION (SEG) HOLDING CELL AND WAS TOLD TO STRIP AND  
PLACE OUT ALL ITEMS, I GAVE C.O. ROTH MY BACK BRACE,  
MY KNEE BRACES, & MY ANKLE BRACES, C.O. ROTH TELLS ME TO  
LIFT UP MY TESTICLES, PULL MY EARS OPEN MY MOUTH & ALL THAT  
I DID I WAS HOLDING ON TO THE DOOR TO DO IT. SO ROTH WAS  
ABOUT TO GIVE ME SOME SEGREGATION CLOTHES, LT. FOLIO CAME  
OVER TO FURTHER HUMILIATE ME HE THREATENING ME STATING I WILL  
HAVE THE SVT UP TEAM COME IN THERE AND MANUALLY DO IT,  
HE ~~REPEATED~~ REPEATED THE SAME STRIP SEARCH ORDERS ROTH  
DID BUT THEN TELLS ME TO STAND IN THE MIDDLE OF THE  
STRIP CAGE AND SPREAD MY ASS CHEEKS, I TELL LT. FOLIO YOU ~~ARE~~  
DONE LOST YOUR MIND, LT. FOLIO WAS CONSTANTLY ISSUING THREATS  
OF HAVING BACK TEAM GUARDS USING FORCE TO SPREAD MY BUTT  
~~CHEEKS~~ CHEEKS, I AM FULLY HANDICAP, I USE A 4 WHEEL  
WALKER & WHEEL CHAIR, I ATTEMPTED TO DO THIS AND FELL  
OVER AND COULNT HOLD MY BALANCE AND FELL FORE HEAD



FIRST INTO THE CONCRETE FLOOR SCRAPPING MY HAND  
& FORE HEAD ON THE FLOOR CAUSING ACUTE PAINS IN BOTH &  
BLOOD ON MY RIGHT HAND PICTURES WAS TAKEN, I WAS EXTREMELY  
DIZZY BEHIND THIS AND IN PAIN, I TOLD FEDIE & ROTH I NEEDED  
A NURSE YOU SEE MY HAND IS BLEEDING THEY IGNORED ME, AND  
SAID SPREAD MY BUTT CHEEKS, I FELL AGAIN ONTO THE CONCRETE  
LT. FEDIE GAVE ME MORE THREATS OF FORCE, DURING THIS WHOLE  
TIME I AM STILL COUGHING FROM THE EXTREME EXPOSURE FROM THE  
OLEBRIN SPRAY, SO ON THE 2ND FALL LT. FEDIE LAUGHS ALONG WITH  
ROTH & THEY WALK AWAY WHILE I AM STILL ON THE FLOOR  
COUGHING AND IN PAIN I PASS OUT I WAKE UP I HAD  
URINATED & DEFICATED, I CRAWL TO THE DOOR PULL MYSELF  
UP STARTED BEATING ON THE CELL DOOR ASKING FOR HELP, AND I  
WAS IGNORED BY 2 JOHNDOR OFFICERS & BILFSON WHILE I  
WAS KNOCKING ON THE DOOR PLEADING FOR HELP THE BOTTOM  
TRAP OPENS UP, I LOWER MYSELF ON THE FLOOR THEN HOLLER FOR  
HELP & STATE I AM BLEEDING MY CHEST & THROAT & STOMACH IS  
HURTING VERY BAD I JUST WAKE UP AND I LOST CONTROL OF MY  
BODILY FUNCTIONS, 3 OFFICERS WAS STANDING WITHIN AT LEAST 10 FEET  
OF ME AND IGNORED ME ONE OFFICER WALKED PAST ME AT  
LEAST 5 TIMES, OFFICER EFFUSON TRIED TO SNOAK UP ON THE  
CAGE TO SHUT THE BOTTOM TRAP, SO AGAIN I SEE I AM NOT  
GOING TO GET KNOW TYPE OF MEDICAL CARE SO I TAKE THE  
FECEES AND THROW IT OUT THE TRAP ON THE WALLS & DOWN TOWARDS  
THE SST CAGE, ~~which~~ IS ABOUT 10 FEET AWAY FROM THE HOLDING CELL  
I WAS IN AND THOSE OFFICERS DID NOTHING THEY DIDNT CARE

THESE OFFICERS WOULD LET ME SUFFER FOR OVER 2 HOURS BEFORE A NURSE FINALLY SHOWED UP, IT WAS A TOTAL OF 5 1/2 HOURS ~~WHEN~~ I FIRST ASKED FOR A NURSE, JOHNDA WATERMAN COMES TO THE SEGREGATION UNIT, I WAS TOLD I HAD TO WEAR A SPIT MUGK CAUSE OF MY THROATS TO SPIT BLOOD ON STAFF SO THIS PROVIDED WATERMAN AN EXCUSE NOT TO EXAMINE WILLIAMS FOREHEAD, AND WATERMAN REPEATEDLY PRETENDED NOT TO SEE THE SWELLING ON MY RIGHT HAND AND IGNORED THE BLOOD ALL OVER THAT HAND AND THE LUMP THAT WAS ON MY RIGHT PINKY FINGER STATING THAT LOOKS LIKE A CALLUS, AND FOR MY STOMACH PAINS & REGURGITATING SHE GAVE THE CAPTAIN ONE TABLET OF PEPTOBISMOL TO GIVE ME I TELL THE CAPTAIN I KNOW THATS NOT GOING TO DO ANYTHING FOR ME I'VE HAD THIS PROBLEM WITH MY STOMACH FOR OVER 30 YEARS PEPTO BISMOL ISNT GO TO DO ANYTHING I TELL THE CAPTAIN THAT USUALLY WHEN THIS HAPPENS I AM TAKEN TO THE HOSPITAL AND GIVEN SOME TYPE OF THICK WHITE MEDICATION AND AN ANTIBIOTIC, I FURTHER TELL THE CAPTAIN I'VE TAKEN AT LEAST 8 TUBS, AND AT LEAST 5 TO 6 OZ OF ROLAX I'VE DRANK SINCE 8 P.M., THE TIME WAS ABOUT 12:40 A.M. WATERMAN REFUSED TO SEND ME TO THE HOSPITAL DISREGARD MY CHEST PAINS FROM THE OLEUM SPRAY & REFUSED TO LOOK AT THE BLOOD IN MY FECES CAPT BROWNMAN WOULD TAKE PICTURES OF MY RIGHT HAND BUT WOULD NOT TAKE PICTURES OF THE BLOODY FECES I THREW ON A PERFECTLY

WHITE WALL, WINTERMAN WAS LESS THAN 3 FEET FROM THE WALL AND WOULD NOT EVEN STICK OUT HER ~~HEAD~~ <sup>AND</sup> LOOK AT THE WALL OF BLOODY FACE THROWN ON THE WALL.

C.O. WEBSTER WAS ALSO ONE OF THE OFFICER WHO DENIED ME ACCESS TO A NURSE WHILE I WAS IN THE SEGREGATION STRIP CAGE HE WALKED PASS THE STRIP CAGE 3 TO 4 TIMES HE EVEN HELD THE CAMERA AT ONE POINT.

I WAS WRITTEN A CONDUCT REPORT DETAILING THE USPA STAFFS VERSIONS OF THE EVENTS AND WAS LET OUT OF SEGREGATION ALMOST 30 DAYS LATER WHILE WAITING FOR THE DISCIPLINARY HEARINGS AND I WAS GIVEN 30 DAYS CELL CONFINEMENT, I EXPLAINED TO THE ONE HEARING OFFICER THAT I WAS SUFFERING BLEEDING IN A LOT OF PAIN FROM THE MEDICATIONS I TOOK, AND THAT AFTER LT. FIDIE SPRAYED THAT SPRAY I HAD EXTREME CHEST PAINS. AND DUE TO MY HANDICAP & SERIOUS MEDICAL CONDITIONS I SHOULD NOT HAD BEEN SPRAYED WITH THAT O.C. SPRAY, DUE TO MY SERIOUS MEDICAL CONDITIONS I SHOULD NOT HAD BEEN SPRAYED WITH THAT O.C. SPRAY.

JULIA PAYNE WOULD REJECT EVERY VERSION OF MY INMATE COMPLAINT GRIEVANCE I FILED ON THIS ISSUE STATING TO MANY ISSUES WHEN I WAS DESCRIBING THE DETAILS SURROUNDING THE COMPLAINTS OF ONE ISSUE OF C.O. EPPSON C.O. LAYTON

C/O. Radio, Sgt Snylor conspiring to cover up they gave me the wrong medications ON February 24, 2019. Mrs Julia Payne HAS established a long history of rejecting a complaint when WSPF staff is mentioned in them, you have to write a vague complaint in order to have the complaint accepted. so when you file a suit they can either say you didn't mention the actors name in the complaint or you didn't exhaust.

Williams furthered filed a complaint on Ut. Police Excessive Force Julia Payne didn't accept the complaint at first.

Then ~~XXXX~~ states there's another administrative process for complaints of staff misconduct and the issue has been looked into and findings has been rendered but don't mention the findings nor does Julia Payne accept the excessive force claims within the complaint which was the moving force that constituted the staff misconduct, to deny the excessive force claims Julia Payne deliberately ignored the excessive force claims and passed the complaint off as staff misconduct, and when I asked for unit video footage to be reviewed I was told by Captain Tom the cameras don't work on Range #1 but they have hand held video footage, those cameras work, if I would off assaulted a prison guard on Range One they would of had every millisecond of camera footage, see Williams v. Stauch 17cv1734 this is a habit of DoD to alter or eliminate video critical footage

Case 1:19-cv-01159-WCG Filed 08/13/19 Page 18 of 21 Document 1  
18 of 21

When that footage can prove all eliminates or the complaint.

Each Guard knew Williams was an individual at risk pursuant to Wisconsin statute 940.285 Williams uses a special 4 wheeled walker, not the typical kind one may be use to seeing him on tv. or in public Williams uses a walker that's specially designed to for a person with a handicap that need more support to the back and arms it's a learners walker as in one who's been in a accident has learned to walk all over again see Williams v. Leslie 1400 452.

Each Guard & Julinda Waterman was deliberately indifferent to Williams serious medical & mental health needs, each defendant was deliberate indifferent to Williams serious medical & mental health conditions by deliberately ignoring Williams medical claims of bleeding from taking the wrong medications, and that the medication would ~~cause~~ <sup>cause</sup> bleeding & stomach pains violating Williams rights to be free from cruel & unusual punishment. The medication also increase's violence which Williams explosive disorders was influenced because of the med of trazadone

Lt. Fedie knew Williams was in no harm of assaulting anyone all Williams wanted for the first 2 hours was to speak to a nurse to explain his serious medical conditions to her nurse Jane Doe deliberately refused to come to Williams cell



AND DESPITE THE KNOWLEDGE LT. FEDIE HAS ABOUT WILLIAMS RESPIRATORY CONDITIONS OR DIFFICULTY OF BREATHING, AT RISK OF FALLING ALL THE TIME LT. FEDIE HAS ESCORTED WILLIAMS TO ~~WORK~~ OFF SITE APPOINTMENTS TO SPECIALIST AND HAS HORMED THE DISCUSSIONS ABOUT SEVERAL OF WILLIAMS SERIOUS CHRONIC MEDICAL CONDITIONS AND STILL SPRAYED WILLIAMS WHO'S HANDICAP WITH OLEIN SPRAY WHICH CAUSED WILLIAMS OVER 2 MONTHS OF DIFFICULTY BREATHING VIOLATING WILLIAMS 8th AMENDMENTS RIGHTS TO BE FREE FROM EXCESSIVE FORCE, WILLIAMS FURTHER STATES LT. FEDIE VIOLATED WIS. STAT. 940.29 ABUSE OF RESIDENTS OF A PENAL FACILITIES, AND WIS. STAT. 940.19 BATTERY,

AT WIS. STAT. 940.19 (B) STATES IF THE PERSON HARMED HAS A PHYSICAL DISABILITY WHETHER CONGENITAL OR ACQUIRED BY ACCIDENT INJURY, OR DISEASES THAT IS DECEARNABLE BY AN ORDINARY PERSON IN VIEWING THE PHYSICAL DISABLED PERSON OR THAT IS ACTUALLY KNOWN BY THE ACTOR SEE ALL ATTACHED DOCUMENTS OF WILLIAMS BEING HANDICAP & HAS MANY SERIOUS MEDICAL CONDITIONS.

JULIA PRYING INTENTIONALLY VIOLATED MY ADMINISTRATIVE

DUE PROCESS RIGHTS FOR REDRESS OF ALL THE INCIDENTS SURROUNDING THE COMPLAINT FILED.

JOLINDA WATERMAN DELIBERATELY DENIED ME MEDICAL CARE.



## CONCLUSION:

MEDICAL DOCUMENTS IS ATTACHED TO THIS COMPLAINT  
STIPULATING <sup>(1)</sup> WILLIAMS HAS A RESPIRATORY CONDITION, <sup>(2)</sup>  
WILLIAMS IS HANDICAPPED 3. AND THE 38 TO 40 MEDICATIONS  
WILLIAMS IS PRESCRIBED THAT HE TAKES DAILY FOR HIS  
SERIOUS MEDICAL CONDITIONS.

## RELIEF REQUESTED

1. UPON ANY JUDGEMENT OF MONETARY PAYMENTS PLAINTIFF WANTS  
THIS COURT TO ORDER EACH DEFENDANT'S WAGES TO BE  
FORFEITED PURSUANT TO THE STATUTES ON PAGES 2, 3, & 4
2. WILLIAMS TO BE ABLE TO AMEND HIS COMPLAINTS AGAINST  
THE ~~DOE~~ DEFENDANTS ONCE IDENTIFIED, GIVEN MORE  
DETAILS TO THEIR DIRECT PARTICIPATION 42 U.S.C. 1983.
3. WILLIAMS WANTS A JURY TRIAL.
4. WILLIAMS WANTS EXPEDITED SCREENING OF HIS  
COMPLAINT FOR THE SOLE REASONS THAT IN WILLIAMS V  
ADAMS THOSE DEFENDANTS IS TRYING TO KILL WILLIAMS.
5. WILLIAMS WANTS A TOTAL OF 1-MILLION DOLLARS IN PUNITIVE  
AND COMPENSATORY DAMAGES FROM EACH DEFENDANT

Signed this 6th day of August 2019 